

Nickelhoff & Widick, PLLC

ATTORNEYS AND COUNSELORS AT LAW

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OF COUNSEL Amy Bachelder | John R. Runyan, Jr.

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August 20, 2020

Division of Judges
1015 Half Street SE
Washington, DC 20570-0001
Honorable Sharon Steckler
Efiled August 20, 2020

**Re: Objections To Election
Mercy Health Partners
Case 07-RC-232247**

Dear Judge Steckler:

The notice of hearing has just issued in the above case setting August 31, 2020 as the hearing date. In prior discussions with the Region I was assured that a hearing date would be scheduled in consultation among the parties and that we would have a month's notice before a hearing.

As discussed in our conference call on August 17, 2020 the above objections will be litigated by Attorney John Runyan of this office who returns from an annual family vacation on August 24, 2020. Mr. Runyan is unfamiliar with the representation case which was handled exclusively by myself, but I am unable to handle the objections hearing as I will be a witness in the hearing. Additionally, I am scheduled to be in an unfair labor practice hearing scheduled for the entire week of August 31, 2020 in Beaumont Hospital, Case 07-CA-244615 before ALJ Gollin.

On behalf of John Runyan, I request a postponement of the hearing date of August 31, 2020. The time upon his return from vacation, one week, is inadequate for preparation of this case including witness preparation and issuance of subpoenas. Additionally as noted above, as a witness, I am unavailable the scheduled week due to a conflicting unfair labor practice trial.

I have contacted the parties to obtain their positions on postponement. The Employer opposes any postponement. Intervenor SEIU has not yet taken a position.

Accordingly, in view of the unreasonably short time before the scheduled hearing, I request

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a postponement to a mutually agreeable date, or alternatively to September 21, 2020. The additional time will provide time for witness preparation, witness availability, issuance of subpoenas and exploration of stipulations which may shorten the hearing.

Thank you for your consideration of this request.

Amy Bachelder

A handwritten signature in blue ink, appearing to read "Amy Bachelder". The signature is fluid and cursive, with the first name "Amy" and last name "Bachelder" clearly distinguishable.

Nickelhoff & Widick, PLLC

CERTIFICATE OF SERVICE

Amy Bachelder, being first duly sworn, deposes and says that on the 20th day of August, 2020 she served a copy of Petitioner's Request for a Postponement on the following via email:

Keith J. Brodie:	Keith.Brodie@btlaw.com
Amy J. Zdravecky:	Amy.Zdravecky@btlaw.com
Andrea Acevedo:	Andrea.Acevedo @seiuhealthcaremi.org
Ken Haney:	Ken.Haney@seiuhealthcaremi.org
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July 20, 2020